

# EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

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Autoscribe Corporation,

*Plaintiff,*

v.

Nuvei Corporation, Nuvei Technologies  
Corporation, and Nuvei Technologies, Inc.,

*Defendants.*

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Civil Action No. 2:24-cv-325

**JURY TRIAL DEMANDED**

**DECLARATION OF VLADA WENDEL IN SUPPORT OF DEFENDANTS' RULE  
12(B)(2) AND 12(B)(3) MOTIONS TO DISMISS**

I, Vlada Wendel, declare:

1. I am a member of the Bar of the State of Texas (Texas State Bar No. 24131751), a registered patent attorney at the United States Patent and Trademark Office (Registration No. 80,849), and an attorney at the law firm of Norton Rose Fulbright US LLP. I am admitted in the Eastern District of Texas and have appeared before the Court in other actions. Based on my experience and work in this case, I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify thereto.

2. On August 14, 2024 I personally investigated the business offices at 5000 Legacy Drive, Plano TX 75024 (“the Location”).

3. None of Nuvei Corporation, Nuvei Technologies Corp., or Nuvei Technologies, Inc. were listed in the directory at the Location.

4. Suite 320 at the Location did not have Nuvei Corporation, Nuvei Technologies Corp., or Nuvei Technologies, Inc. in the plaque underneath the suite number—the plaque was blank.

5. Next to Suite 320 was Suite 330. Suite 330 had “Medsurant Health” listed in the plaque underneath it.

6. I spoke with Edie Thomas, Assistant Property Manager at the Location, who said that Nuvei has not been a tenant for approximately three years. Edie Thomas said that she has been working at the Location for approximately twenty years.

7. No visible signs for Nuvei Corporation, Nuvei Technologies Corp., or Nuvei Technologies, Inc. were near the Location, including on the exterior of the building and the directory sign to the entrance of the Location.

8. Attached as Exhibit A are photographs I took on August 14, 2024 at the Location.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This declaration is executed on August 15, 2024 at Dallas, Texas.

/s/ *Vlada Wendel*  
Vlada Wendel



# **EXHIBIT A**



# DIRECTORY

Welcome To

## 5000 Legacy

5000 Legacy Dr, Plano, TX 75024

3:12PM

AUGUST 14



Clear

101° / 82°

PLEASE MAKE A SELECTION BELOW

BROWSE DIRECTORY

FLOORPLANS

AREA MAP

MANAGEMENT & LEASING

## DIRECTORY

M-O

PLEASE MAKE A SELECTION

Medsurant Holdings LLC

Mustang Creek

Nicholson Clinic

Nicholson Clinic Business Office

List All

#/A-C

D-F

G-I

J-L

M-O

P-R

S-U

V-Z

BACK

HOME















